

**REVIEW OF RECENT DISENROLLMENTS THROUGH SSA FIELD OFFICE****WS-MK2**

Name/HI Number	Date HCFA-566 Signed	Date of Enrollment	Name of Marketing Representative	Reason for Disenrollment, if Disenrollment Date is within 90 Days of Enrollment	Marketing Abuse/ Prohibited Practices Indicated?	What Corrective Action Taken by M+CO (if any)?

Standard: See Instructions

Determination: Transfer results of this sample to the appropriate requirements at MK05 - MK09 (Prohibited Activities), AM01 - AM02, AM05 of the *Review Guide*.

## **REVIEW OF RECENT DISENROLLMENTS THROUGH SSA FIELD OFFICES**

**WS-MK2**

**Requirement:** In offering its product to Medicare enrollees, the M+CO contractor may not engage in prohibited practices: activities that are discriminatory; activities, including written or oral statement, which **materially** mislead, confuse or misrepresent the M+CO, the marketing representative, or HCFA; offers of gifts or payment as an inducement to enroll; **use providers or provider groups to distribute printed information comparing the benefits of different health plans unless all M+COs concur and have received prior approval by HCFA; accept plan applications in provider offices or other places where health care is delivered; employ M+C plan names that suggest a plan is not available to all Medicare beneficiaries (does not apply to M+C plan names in effect on July 31, 2000); and door-to-door solicitation of Medicare beneficiaries (42 CFR 417.428(b)) 422.80(e)).** The M+CO must assure that its employees do not conduct prohibited marketing activities (42 CFR 417.412-~~422.501(b)(3)~~) .

**Sample:(OPTIONAL)** If reviewer suspects there are problems, this sample should be taken. The reviewer should develop a list of the universe from the M+CO's most recently processed form HCFA-566s forwarded by SSA Field Offices within the past month (additional months if necessary). In many cases, these are routinely sent by the SSA to the RO. From this universe, the reviewer will select a sample of disenrollment transactions in accordance with random selection methods discussed in the *Review Guide* Instructions, under Sampling Methodology. Call the beneficiary and determine the reasons for disenrollment.

**Purpose:** To determine, through phone discussion with beneficiaries, whether the marketing of Medicare was carried out appropriately. (NOTE: A major indication of problems is a high rate of disenrollments in the first 90 days after enrollment (e.g., rules and responsibilities are not clearly discussed during marketing sessions, pressure is being applied to the beneficiary to enroll, the M+CO seems to be delaying provision of a specific service). Is the M+CO paying attention to the activities of individual sales agents (whether staff or under contract) and responding to instances of possible marketing abuses? What administrative and managerial arrangements does the M+CO use in operating its marketing department? What oversight does management and the Board exercise?)

Phone calls made to the beneficiaries prior to the site visit may provide beneficiary perceived problems related to areas other than marketing. This information could be used in focusing the reviews of the pertinent areas of operation.

### **Column Explanations:**

**Name/HI Number:** Self-explanatory. Number optional.

**Date the HCFA-566 was Signed:** Obtain from the HCFA-566 disenrollment form.

**Date of Enrollment:** Obtain from the GHP system or the beneficiary.

**Name of Marketing Representative:** Obtain from the beneficiary if he/she remembers or request from the M+CO. Determine the name of the sales agent.

**Reason for Disenrollment, if Disenrollment Date is within 90 Days of Enrollment:** Focus specifically on the beneficiary's reasons that may indicate an inappropriate marketing practice; e.g., the beneficiary never intended to enroll; was unaware that he/she enrolled; wanted to keep his/her own doctor, etc.

**Marketing Abuse/Prohibited Practices Indicated?** Could the beneficiary's reason for disenrolling be considered one of the prohibited activities?

**What Corrective Action Taken by the M+CO:** If a pattern appears to exist, review data to assess how wide-spread the problem may be. How does this M+CO compare to other M+COs in the marketplace. Where there is suspected inappropriate marketing practices, ask to see the agents' file (use these names in completing WS-MK3). What actions did the M+CO take? Was the sales agent retrained, recertified, disciplined or terminated? What systems set up to prevent activity happening again? What oversight has been developed?

**Determination of Acceptability:** There is no percentage standard, however, this information should be used for determining whether M+CO has adequate administrative and managerial

arrangements to control its marketing activities, thus assuring that specific marketing activities for beneficiaries are appropriate.